

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

WESTERN DISTRICT OF MICHIGAN

Case number (if known) Chapter **11**☐ Check if this an amended filing

## Official Form 201

**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

4/19

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

|   |   |   |
|---|---|---|
| 1. Debtor's name  | <u>Sarah Air, LLC</u>   |   |
| 2. All other names debtor used in the last 8 years<br>Include any assumed names, trade names and <i>doing business as</i> names |   |   |
| 3. Debtor's federal Employer Identification Number (EIN)  |   |   |
| 4. Debtor's address   | <b>Principal place of business</b><br><br><u>Najeeb Khan</u><br><u>Sole Member</u><br><u>23443 Lakeview Drive</u><br><u>Edwardsburg, MI 49112</u><br>Number, Street, City, State & ZIP Code<br><br><u>Cass</u><br>County                      | <b>Mailing address, if different from principal place of business</b><br><br><u>PO Box 360</u><br><u>Granger, IN 46530</u><br>P.O. Box, Number, Street, City, State & ZIP Code<br><br><b>Location of principal assets, if different from principal place of business</b><br><u>2228 Airport Drive</u><br><u>Hanger 25 Elkhart, IN 46514</u><br>Number, Street, City, State & ZIP Code |
| 5. Debtor's website (URL) _____   |   |   |
| 6. Type of debtor   | <input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))<br><input type="checkbox"/> Partnership (excluding LLP)<br><input type="checkbox"/> Other. Specify: _____ |   |

Debtor **Sarah Air, LLC**  
Name

Case number (if known)

**7. Describe debtor's business** A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

## B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.  
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

\_\_\_\_\_

**8. Under which chapter of the Bankruptcy Code is the debtor filing?** Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,725,625 (amount subject to adjustment on 4/01/22 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

|          |       |      |       |             |       |
|----------|-------|------|-------|-------------|-------|
| District | _____ | When | _____ | Case number | _____ |
| District | _____ | When | _____ | Case number | _____ |

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

- ☐ No
- ☒ Yes.

List all cases. If more than 1, attach a separate list

|          |                       |                       |       |
|----------|-----------------------|-----------------------|-------|
| Debtor   | <b>See Attachment</b> | Relationship          | _____ |
| District | _____                 | When                  | _____ |
|          |                       | Case number, if known | _____ |

Debtor **Sarah Air, LLC**  
Name

Case number (if known)

**11. Why is the case filed in this district?***Check all that apply:*

- ☐ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☒ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (*Check all that apply.*)☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other \_\_\_\_\_**Where is the property?** \_\_\_\_\_

Number, Street, City, State &amp; ZIP Code

**Is the property insured?**☐ No☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information****13. Debtor's estimation of available funds***Check one:*

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

**14. Estimated number of creditors**☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☒ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☒ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

Debtor **Sarah Air, LLC**  
Name

Case number (if known)

**Request for Relief, Declaration, and Signatures****WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **October 8, 2019**  
MM / DD / YYYY**X /s/ Najeeb Khan**

Signature of authorized representative of debtor

**Najeeb Khan**

Printed name

Title **Member****18. Signature of attorney****X /s/ Robert F. Wardrop II**

Signature of attorney for debtor

Date **October 8, 2019**

MM / DD / YYYY

**Robert F. Wardrop II (P31639)**

Printed name

**Wardrop & Wardrop, P.C.**

Firm name

**300 Ottawa Avenue, N.W.****Suite 150****Grand Rapids, MI 49503-2308**

Number, Street, City, State &amp; ZIP Code

Contact phone **(616) 459-1225**Email address **bkfilings@wardroplaw.com****(P31639) MI**

Bar number and State

Debtor **Sarah Air, LLC**  
Name

Case number (if known)

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

WESTERN DISTRICT OF MICHIGAN

Case number (if known) Chapter **11**

☐ Check if this an amended filing

**FORM 201. VOLUNTARY PETITION**  
**Pending Bankruptcy Cases Attachment**

|          |  |                      |                        |                  |
|----------|--|----------------------|------------------------|------------------|
| Debtor   | <b>Sarah Air, LLC</b>                                      |                      | Case number (if known) |                  |
|          | Name   |                      |                        |                  |
| Debtor   | <b>GN Investments, LLC</b>                                 |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Western District of Michigan</b> | When <b>10/08/19</b> | Case number, if known  |                  |
| Debtor   | <b>Interlogic Outsourcing, Inc.</b>                        |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31445</b>  |
| Debtor   | <b>IOI Payroll Services, Inc.</b>                          |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31446</b>  |
| Debtor   | <b>IOI West, Inc.</b>                                      |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31447</b>  |
| Debtor   | <b>Khan Aviation, Inc.</b>                                 |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Western District of Michigan</b> | When <b>10/08/19</b> | Case number, if known  |                  |
| Debtor   | <b>KRW Investments, Inc.</b>                               |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Western District of Michigan</b> | When <b>10/08/19</b> | Case number, if known  |                  |
| Debtor   | <b>Lakeview Holdings, Inc.</b>                             |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31448</b>  |
| Debtor   | <b>Lakeview Technology, Inc.</b>                           |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31449</b>  |
| Debtor   | <b>ModEarn, Inc.</b>                                       |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31450</b>  |
| Debtor   | <b>Najeeb Khan</b>   |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Western District of Michigan</b> | When <b>10/08/19</b> | Case number, if known  | <b>19-04258</b>  |
| Debtor   | <b>NAK Holdings, LLC</b>                                   |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Western District of Michigan</b> | When <b>10/08/19</b> | Case number, if known  |                  |
| Debtor   | <b>NJ Realty, LLC</b>                                      |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Western District of Michigan</b> | When <b>10/08/19</b> | Case number, if known  |                  |
| Debtor   | <b>TimePlus Systems, LLC</b>                               |                      | Relationship to you    | <b>Affiliate</b> |
| District | <b>U.S. Bankruptcy Court, Northern District of Indiana</b> | When <b>8/11/19</b>  | Case number, if known  | <b>19-31451</b>  |

**United States Bankruptcy Court  
Western District of Michigan**

In re **Sarah Air, LLC**

Debtor(s)

Case No.

Chapter **11**

**LIST OF EQUITY SECURITY HOLDERS**

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

| Name and last known address or place of business of holder | Security Class | Number of Securities | Kind of Interest |
|--|----------------|----------------------|------------------|
|--|----------------|----------------------|------------------|

**Najeeb Khan  
PO Box 360  
Granger, IN 46530**

**Membership**

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the **Member** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **October 8, 2019**

Signature **/s/ Najeeb Khan**  
**Najeeb Khan**

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.  
18 U.S.C. §§ 152 and 3571.*

**United States Bankruptcy Court  
Western District of Michigan**

In re **Sarah Air, LLC**

Debtor(s)

Case No.

Chapter

**11**

**VERIFICATION OF CREDITOR MATRIX**

I, the Member of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: **October 8, 2019**

**/s/ Najeeb Khan**

**Najeeb Khan/Member**

Signer/Title



INTERNAL REVENUE SERVICE  
INSOLVENCY UNIT  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY  
OPERATION  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE  
3251 N. EVERGREEN DRIVE, NE  
INSOLVENCY GROUP 4, STOP 93  
GRAND RAPIDS MI 49525

KEYBANK NATIONAL ASSOCIATION  
ATTN: MARK R. KLEINHAUT  
66 SOUTH PEARL STREET  
ALBANY NY 12207

MICHIGAN DEPT OF TREASURY  
BANKRUPTCY - CLAIMS UNIT  
PO BOX 30168  
LANSING MI 48909

MICHIGAN DEPT. OF TREASURY  
OFFICE OF COLLECTIONS  
PO BOX 30199  
LANSING MI 48909

MICHIGAN ESC  
UNEMPLOYMENT INSURANCE AGENCY  
11TH FLOOR, TAX OFFICE  
3024 W. GRAND BLVD.  
DETROIT MI 48202

NANCY KHAN  
23451 LAKEVIEW DRIVE  
EDWARDSBURG MI 49112

OFFICE OF THE U.S. TRUSTEE  
THE LEDYARD BLDG 2ND FLOOR  
125 OTTAWA AVE., NW, STE 200R  
GRAND RAPIDS MI 49503

OFFICE OF THE US TRUSTEE  
THE LEDYARD BLDG, 2ND FL  
125 OTTAWA NW, STE 200R  
GRAND RAPIDS MI 49503

THOMPSON HINE, LLP  
ATTN: CURTIS TUGGLE & DAVID THOMAS ESQS  
127 PUBLIC SQUARE  
300 KEY CENTER  
CLEVELAND OH 44114

US ATTORNEY'S OFFICE  
WESTERN DISTRICT OF MICHIGAN  
BANKRUPTCY SECTION  
PO BOX 208  
GRAND RAPIDS MI 49501-0208

**United States Bankruptcy Court  
Western District of Michigan**

In re **Sarah Air, LLC**

Debtor(s)

Case No.  
Chapter**11**

**CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)**

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Sarah Air, LLC** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

■ None [*Check if applicable*]

**October 8, 2019**

Date

**/s/ Robert F. Wardrop II****Robert F. Wardrop II (P31639)**

Signature of Attorney or Litigant

Counsel for **Sarah Air, LLC****Wardrop & Wardrop, P.C.****300 Ottawa Avenue, N.W.****Suite 150****Grand Rapids, MI 49503-2308****(616) 459-1225 Fax:(616) 459-7273****bkfilings@wardroplaw.com**

**United States Bankruptcy Court**  
**Western District of Michigan**

In re **Sarah Air, LLC**

Debtor(s)

Case No.

Chapter

**11**

**STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION**

I, **Najeeb Khan**, declare under penalty of perjury that I am the **Sole Member** of **Sarah Air, LLC**, and that the following is a true and correct copy of the resolutions adopted by the Board of Directors of said corporation at a special meeting duly called and held on the 8th day of October, 2019.

"Whereas, it is in the best interest of this corporation to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Najeeb Khan, Sole Member** of **Sarah Air, LLC**, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that **Najeeb Khan, Sole Member** of **Sarah Air, LLC** is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Najeeb Khan, Sole Member** of **Sarah Air, LLC** is authorized and directed to employ **Robert F. Wardrop II (P31639)**, attorney and the law firm of **Wardrop & Wardrop, P.C.** to represent the corporation in such bankruptcy case."

Date 10/08/19Signed /s/ Najeeb Khan**Najeeb Khan**

Resolution of Board of Directors  
of  
**Sarah Air, LLC**

Whereas, it is in the best interest of this corporation to file a voluntary petition in the the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Najeeb Khan, Sole Member of Sarah Air, LLC**, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that **Najeeb Khan, Sole Member of Sarah Air, LLC** is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Najeeb Khan, Sole Member of Sarah Air, LLC** is authorized and directed to employ **Robert F. Wardrop II (P31639)**, attorney and the law firm of **Wardrop & Wardrop, P.C.** to represent the corporation in such bankruptcy case.

Date 10/08/19

Signed /s/ Najeeb Khan  
**Najeeb Khan**

Date \_\_\_\_\_

Signed \_\_\_\_\_